

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In Re:)	In Proceedings Under Chapter 7
)	Hon. Charles E. Rendlen, III
Donald E. Sallee, II)	
)	Case No. 14-46182-705
Debtor.)	
)	RESPONSE OF DEBTOR TO
)	MOTION OF CREDITOR ARDMORE
)	HOLDINGS, LLC FOR EXTENSION OF TIME
)	TO OBJECT TO DEBTOR'S DISCHARGE,
)	CHALLENGE DISCHARGEABILITY OR FILE
)	A MOTION TO CONVERT
)	
)	Robert A. Breidenbach (ARN 41557MO, MBE 41557)
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COMES NOW Donald E. Sallee, II ("Debtor"), by and through his undersigned counsel, and in response to the ***Motion of Creditor Ardmore Holdings, LLC for Extension of Time to Object to Debtor's Discharge, Challenge Dischargeability or File a Motion to Convert*** (the "Motion") es to this honorable Court as follows:

1. Movant and its predecessors aggressively litigated claims against Debtor in a state court proceeding regarding Debtor's liability under a personal guaranty. In July of 2012 the court entered a judgment against Debtor (the "Judgment"). Thereafter, Movant and its predecessors aggressively sought to collect upon that Judgment.

2. Debtor commenced this case on August 5, 2014 and Movant's predecessor in interest and its counsel of record received notice of the filing.

3. Movant in fact appeared at the section 341 meeting of creditors in person and by counsel and asked all the questions it wished of Debtor before concluding its examination.

4. Debtor is and will cooperate with Movant and will respond to any reasonable requests for information from Movant. The undersigned further indicated that he would not oppose a thirty (30) day extension of the deadlines to file a Complaint under 11 U.S.C. §523 or 727 **for Movant alone**. The Motion; however, requests a sixty (60) day extension.

5. Given the prior litigation between the parties, the post judgment activities of the Movant and the fact that Movant already availed itself of the opportunity to conduct an examination of Debtor at the Section 341 Meeting of Creditors, Debtor submits that Movant has already had a significant amount of time to conduct its “investigation” and that an extension, if any is to be given, should be for only a period of thirty (30) days.

WHEREFORE, Debtor consents to an extension of time **for Movant alone**, through and including December 4, 2014 to file a complaint under 11 U.S.C. §523 or §727, requests that such extension be the only extension granted to Movant in this matter, and requests that the Court grant Debtor such additional and further relief as is just and proper.

GOLDSTEIN & PRESSMAN, P.C.

By: /s/ Robert A. Breidenbach
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served this 22nd day of October, 2014 by first-class mail, postage prepaid, to the following parties, unless said parties received service by electronic means:

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